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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096

SF File Number

12.00

August 8, 2000

Richard T. Montgomery, P.E.
Flathead City-County Health Department
723 5th Ave. East
Kalispell, MT 59901

Dear Mr. *Dick* Montgomery:

I am writing you as a follow-up to our telephone conversation today concerning ground water use controls for the BN Somers Superfund site located in Somers, Montana.

The current status of the site is as follows:

- Contaminated soils have been excavated and are being treated in an on-site biological land treatment unit. Treatment will be completed in one year.
- An area of contaminated ground water extends from the former plant to the southeast across Somers Road.
- A ground water treatment system located on the former plant site began operating in 1995 and will continue to operate for some time. The system consists of a series of extraction and injection wells, activated carbon units, nutrient addition capability and monitoring wells.
- There are no residential wells located in the impacted area and the Somers Water and Sewer District provides drinking and irrigation water.
- The Record of Decision for the site, issued in 1989, required the establishment of institutional controls on ground water use.

A copy of the draft *Technical Impracticability Evaluation for Groundwater Restoration* prepared by ThermoRetec Corporation is enclosed for your information.

Because the site cleanup has progressed to the current state, the Burlington Northern Santa Fe Railway has been approached by parties interested in using portions of the site for recreational development. Any property sale would include deed restrictions, however deed restrictions are difficult to enforce and are not adequate to control ground water use.



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As you are aware, the Montana Department of Natural Resources and Conservation (DNRC) has the authority to establish controlled ground water areas such as the designated area associated with the Bozeman Solvents site. EPA believes that a controlled ground water use area established through DNRC rules would provide the desired level of control for public health protection and to protect the effectiveness of the ground water treatment system at the BN Somers site.

The participation of the Flathead City/County Health Department as sponsor of a petition for the establishment of a controlled ground water use area associated with the BN Somers site is hereby requested. The technical component of the petition will be prepared by the Burlington Northern Santa Fe Railway. EPA and the Montana Department of Environmental Quality (MDEQ) will participate in planning and review. Arrangements can be made for compensation to the Flathead City/County Health Department for your efforts as the petition sponsor.

Please let me know what your reaction is to this request and if you require additional information. I am available to discuss this issue with your Board at your convenience.

Sincerely,


James C. Harris, P.E.
Remedial Project Manager

Attachment:

Sent
cc: L. DeWitt, MDEQ (w/o attachment)